

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
:
:
:
v. :
:
Criminal Number: 07-76 (MLC)
CURTIS G. WHITEFORD, :
DEBRA M. HARRISON, :
MICHAEL B. WHEELER, :
SEYMOUR MORRIS, JR., :
WILLIAM DRIVER, :
:
To be filed Under Seal
Defendants. :
:

**GOVERNMENT'S APPLICATION FOR ORDER
PERMITTING SPECIAL AGENTS TO TRANSPORT INMATE
ROBERT STEIN**

Comes now the United States of America, by and through its undersigned counsel, and hereby submits this application for an order permitting Internal Revenue Service Criminal Investigations ("IRS-CI") Special Agents Cam Costello, Randolph Gregory, Special Inspector General for Iraq Reconstruction ("SIGIR") Special Agent Wallace Young, and/or Immigration and Customs Enforcement ("ICE") Special Agent David Papazian to take Robert Stein (BOP # 16385-056) out of the Monmouth County Correctional Institution ("MCCI") on September 6, 2008, at approximately 8:00 a.m. for the purpose of transporting him to the United States Courthouse for the District of New Jersey in Trenton, New Jersey so that he may meet with the undersigned in preparation for the upcoming criminal trial, United States v. Whiteford, 07-Cr-76, before the Honorable Mary L. Cooper.

1. On September 6, 2008, IRS-CI and ICE agents will be assigned to take the

defendant to the District of New Jersey in Trenton, New Jersey. The Defendant will then be returned by those Agents to MCCI at approximately 6:00 p.m. the same day.

2. The U.S. Marshals Service has been advised of and has no objection to this application.

3. The defendant's attorney has been notified of these transfers and meetings and has no objection.

4. Because the defendant is a named co-conspirator in the upcoming trial, the government respectfully requests that this application and accompanying order be filed under seal.

WHEREFORE, it is respectfully requested that this Court issue an order permitting Special Agents of the IRS-CI and/or ICE to take the defendant from the Monmouth County Jail on September 6, 2008 and transport him to the United States Courthouse for the District of New Jersey in Trenton, New Jersey, and to return him to the MCCI no later than 7:00 p.m.

Dated: September 4, 2008

WILLIAM M. WELCH
Chief, Public Integrity Section

/s/

ANN C. BRICKLEY
JOHN P. PEARSON
Trial Attorneys
U.S. Department of Justice
Criminal Division
1400 New York Ave., NW
Washington, DC 20005
(202) 514-1412

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	
	:	
	:	
v.	:	
	:	Criminal Number: 07-76 (MLC)
CURTIS G. WHITEFORD,	:	
DEBRA M. HARRISON,	:	
MICHAEL B. WHEELER,	:	
SEYMOUR MORRIS, JR.,	:	Under Seal
WILLIAM DRIVER,	:	
	:	
Defendants.	:	
	:	

ORDER

Upon consideration, the Government's Application for Order Permitting Special Agents to Transport Defendant is hereby Granted. Special Agents of the Internal Revenue Service Criminal Investigations ("IRS-CI") Special Agents Cam Costello, Randolph Gregory, Special Inspector General for Iraq Reconstruction ("SIGIR") Special Agent Wallace Young and/or Immigration and Customs Enforcement ("ICE") Special Agent David Papazian are hereby permitted to take Robert Stein (BOP # 16385-056) out of the Monmouth County Correctional Institution ("MCCI") on September 6, 2008, at approximately 8:00 a.m. and transport him to the to the United States Courthouse for the District of New Jersey in Trenton, New Jersey. The defendant will be returned no later than 7:00 p.m.

This order will be sealed until further notice.

ORDERED this 4th day of ~~Sept~~^{Sept}, 2008.

Mary L. Cooper
HONORABLE MARY L COOPER
UNITED STATES DISTRICT JUDGE